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December 28, 2021

1/3/2022

By ECF

Honorable Paul A. Crotty  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: *United States v. John Doe #2, 16 Cr. 588 (PAC)*

The request (V) is GRANTED

No ordered

Paul J. Crotty  
08/12/21

Your Honor:

I represent John Doe #2 (JD-2) in the above-captioned case and I write with the government's consent respectfully to request leave to file the attached redacted version of JD-2's January 14, 2021 compassionate release motion. I was appointed to represent JD-2 on June 25, 2021, at which time he already had a compassionate release motion pending. His motion was denied in an opinion dated November 16, 2021 (Dkt. 44). In that opinion, the Court instructed the parties to file "pseudonymized" versions of the compassionate release briefing on the public docket. *Id.* at 9.

Because I did not represent JD-2 when his motion was filed, I did not have a Word or otherwise editable version of his motion papers. I reached out to his prior counsel, Clinton Calhoun, who has retired. Mr. Calhoun was only able to share PDFs with me, as was the government. As a result, pseudonymizing the papers would require me to retype the entire motion; it would be a substantial expenditure of CJA resources. In lieu of pseudonymizing the brief, I respectfully seek leave to file the attached redacted version. The redacted version allows substantially all of the brief to be publicly filed, while redacting the names of the two John Doe defendants as well as two references to the facility where JD-2 is housed; given the limited number of inmates in the facility and JD-2's unique combination of medical conditions, I am concerned that leaving the name of the facility unredacted will make JD-2 identifiable.

For the foregoing reasons, I respectfully request leave to file the attached redacted version of JD-2's compassionate release motion in lieu of filing a pseudonymized version. I conferred with Assistant United States Attorney Emil Bove and the government